

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

PENDLETON HEIGHTS GAY-STRAIGHT )  
ALLIANCE, an unincorporated association, )  
 )  
Plaintiff, )  
 )  
v. ) No. 1:21-cv-02480-JRS-TAB  
 )  
SOUTH MADISON COMMUNITY )  
SCHOOL CORPORATION, *et al.*, )  
 )  
Defendants. )

## **Declaration of Ann D'Angelo**

Ann D'Angelo, being duly sworn, says that:

1. I am the Litigation Support Manager at the ACLU of Indiana.
2. I have listened to selected Pendleton Heights High School Daily Announcements for the 2020-2021 school year that can be found at <https://audioboom.com/playlists/4633761-2020-2021>. The announcements are from February 1, 2021 to May 26, 2021.
3. I have also listened to the Pendleton Heights High School Daily Announcements that can be found at <https://audioboom.com/channels/5043510> for the 2021-2022 school year from August 5, 2021 to December 8, 2021.
4. Each announcement is in a separate audio file organized by date.

5. I have copied all the announcements on a flash drive that I understand is being separately filed contemporaneously with the filing of this declaration.

6. The announcements frequently begin with information from the guidance department, information about school sports, and/or other school-related matters. The announcements then often have a portion that begins with the announcer stating: "Now here is the latest from around our campus and the community." This is then followed by the mention of what I presume to be clubs or organizations with a description of upcoming meetings, events, or other club activities. An exception to this were the announcements of February 2, 2021 and February 5, 2021, where the announcement concerning Rugby was preceded by the statement that it was from the Athletic Department.

7. A particular club or organization announcement of a meeting or event is regularly repeated leading up to the meeting or event that is described. For example, on October 1, 2021, there was an announcement for the Outdoor Adventure Club that said:

Have you ever wanted to climb on cliffs? How about snow skiing or snowboarding? Do you like camping, hiking, kayaking down a river? Have you ever walked and crawled through a cave? Does paint ball sound like fun? These are some of the possibilities when you join the Outdoor Adventure Club. Come to a call out meeting Wednesday the 6th of October in Room 220, Mr. Hinton's room, either before school at 7:10 or after school at 2:35.

The above announcement was repeated, in substantially similar form, on October 4th, 5th, and 6th.

8. I have listed the announcements made for what I assume to be clubs or organizations that are mentioned on the Pendleton Heights High School Daily Announcements for the dates specified below. If there were no club or organization meetings announced, only the date is listed. I have listed all dates that I have reviewed below. There are some calendar dates when there is not a Daily Announcement listed on the website and those dates are omitted from the listings below.

2020-2021 School year

February:

- 1
- 2      Rugby
- 5      Rugby
- 8
- 9
- 10
- 11     German Club
- 12
- 19     German Club
- 22     German Club
- 23
- 24
- 25
- 26

March

- 1
- 2      Girls only Try Wrestling and Rugby Day
- 3      Girls only Rugby and Wrestling Clinic, German Club

4 Girls only Try Rugby and Wrestling Clinic was a success, with contact information to contact Mr. Trout if want to participate in current season of Rugby , German Club  
5 German Club  
8 German Club  
9  
10  
11  
12  
29  
30  
31

April

1  
2 Bring Change to Mind  
5 Bring Change to Mind  
6 Bring Change to Mind  
7 Bring Change to Mind, Beta Club  
8  
9  
12  
13  
14 German Club  
15 German Club  
16 German Club  
19 German Club  
20  
21  
22  
23  
26  
27  
28  
29 Beta Club  
30 Beta Club

May

- 3
- 4 Best Buddies
- 5 Best Buddies
- 6
- 7
- 10
- 11 German Club
- 12 German Club
- 13 German Club
- 14 German Club
- 17
- 18
- 19
- 20
- 21
- 24 Best Buddies
- 25 Best Buddies
- 26 Best Buddies

2021-2022 School year

August 2021:

- 5
- 6
- 9 Beta Club
- 10 Beta Club; Bring Change to Mind
- 11 Beta Club; Bring Change to Mind
- 12 Beta Club; Bring Change to Mind
- 13 Beta Club; Bring Change to Mind; German Club; Best Buddies
- 16 Beta Club; Bring Change to Mind; German Club; Best Buddies
- 17 Beta Club; Bring Change to Mind; German Club; Best Buddies
- 18 Bring Change to Mind; German Club; Best Buddies
- 30 German Club; SADD
- 31 SADD

September 2021:

- 1 SADD; FCCLA
- 2 SADD; FCCLA
- 7 FCCLA; FFA
- 8 FCCLA; FFA
- 9 FSSLA; FFA; Best Buddies; The Muse
- 10 FCCLA; FFA; Best Buddies; The Muse
- 13 FCCLA, The Muse; FFA
- 14 FCCLA; The Muse; FFA
- 15
- 16
- 17
- 20 German Club; Art Club
- 21 Art Club
- 22 Art Club
- 23
- 24
- 27 Beta Club
- 29 Beta Club
- 30 Beta Club

October 2021:

- 1 Beta Club; Outdoor Adventure Club
- 4 Outdoor Adventure Club
- 5 Outdoor Adventure Club
- 6 Outdoor Adventure Club; German Club
- 7 German Club
- 8 German Club
- 18 German Club
- 19 Best Buddies; Art Club
- 20 Best Buddies
- 21 Best Buddies
- 22 Best Buddies; Social Studies Academic Team; JAG Leadership Team
- 26 Best Buddies; Social Studies Academic Team
- 27 Best Buddies
- 28 Best Buddies
- 29

November 2021:

- 1 Best Buddies
- 2 Best Buddies
- 3 Best Buddies
- 4 Best Buddies
- 5 Best Buddies
- 8
- 10 Outdoor Adventure Club
- 11 Outdoor Adventure Club; German Club
- 12 Outdoor Adventure Club; German club
- 15 Outdoor Adventure Club
- 16 Outdoor Adventure Club; German Club
- 17 Outdoor Adventure Club; German Club
- 18 German Club
- 19 German Club
- 22 German Club
- 23
- 29
- 30 Beta Club; Spanish Club

December 2021

- 1 Beta Club; Spanish Club; Outdoor Adventure Club
- 2 Beta Club; Spanish Club; Outdoor Adventure Club
- 3 Beta Club; Outdoor Adventure Club
- 6 Beta Club; Outdoor Adventure Club
- 7
- 8

**Verification**

I verify under the penalty of perjury that the foregoing is true and correct.

Executed on: 10/16/21  
(DATE)

  
Ann D'Angelo

Prepared by:

Kenneth J. Falk  
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